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Trustee of the LPG Liquidation Trust

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA (SANTA ANA DIVISION)**

In re:

The Litigation Practice Group P.C.,  
  
Debtor(s).

Chapter 11

Case No. 8:23-bk-10571-SC

Adv. Proc. No. 8:25-ap-01208-SC

Richard A. Marshack, Trustee of the LPG  
Liquidation Trust,

Plaintiff,

v.

Oxford Knox, LLC, et al.

Defendants

**STIPULATION BETWEEN PLAINTIFF  
RICHARD A. MARSHACK, TRUSTEE OF  
THE LPG LIQUIDATION TRUST, AND  
DEFENDANT ROSA BIANCA LOLI  
DISMISSING LOLI ONLY FROM THE  
COMPLAINT AND VACATING HEARING  
DATE FOR HER PENDING MOTION TO  
DISMISS**

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED  
PARTIES:**

This Stipulation ("Stipulation") is entered into by and between Plaintiff Richard A. Marshack, the Trustee of the LPG Liquidation Trust, ("Trustee") and Defendant Rosa Bianca Loli ("Ms. Loli") (collectively the "Parties"), with regard to the following:

## RECITALS

A. On March 20, 2023, the Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, commencing this bankruptcy case.

**B.** On March 19, 2025, the Trustee filed this Adversary Proceeding (“Adversary”).

C. On May 7, 2025, Ms. Loli, through counsel, filed a Motion to Dismiss Adversary Proceeding and Amended Complaint (“Motion to Dismiss”) [Dkt. No. 9], which is set for hearing on July 17, 2025 at 1:30 p.m. Rather than seeking to dismiss only Ms. Loli from this Adversary, the Motion to Dismiss asks the Court to dismiss the entire Adversary with prejudice for failing to state a claim against her.

**D.** The Trustee’s Complaint, as amended, does not identify any transfers made directly to Ms. Loli. Ms. Loli was named as a defendant because she was allegedly a member of BAE Enterprises, Inc. (“BAE”), which was a member of Defendant Oxford Knox, LLC (“Oxford Knox”). In recent conversations with counsel for the Trustee, Mr. Tony Diab has stated that neither BAE nor Ms. Loli, received funds through Oxford Knox. The Trustee has accepted this statement from Mr. Diab as true and correct.

E. The Trustee has also named Ms. Loli as a Defendant in Adversary Proceeding Nos. 8:23-ap-01046 and 8:25-ap-01181 (“Other Adversaries”).

**F.** Given the pending Motion to Dismiss, the Parties stipulate, agree, and request that the Court enter an Order as follows:

## STIPULATION

1. The Parties request that the Court enter an order dismissing Ms. Loli from this Adversary Proceeding. The Parties agree that Ms. Loli's dismissal will be with prejudice as to any



**PROOF OF SERVICE**

I am over the age of 18 and not a party to this case. My business address is **100 West Main Street, Suite 900, Lexington, Kentucky 40507**. True and correct copies of the foregoing documents:

**STIPULATION BETWEEN PLAINTIFF RICHARD A. MARSHACK, TRUSTEE  
OF THE LPG LIQUIDATION TRUST, AND DEFENDANT ROSA BIANCA LOLI  
DISMISSING LOLI ONLY FROM THE COMPLAINT AND VACATING HEARING  
DATE FOR HER PENDING MOTION TO DISMISS**

will be served in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

**(NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 10, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; bryn@lesliecohenlaw.com
- **Richard A Marshack (TR)** - pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Tyler Powell** - tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;  
wendy.yones@dinsmore.com
- **United States Trustee (SA)** - ustpregion16.sa.ecf@usdoj.gov

**2. SERVED BY UNITED STATES MAIL**: On June 10, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**SEE ATTACHED SERVICE LIST**

**3. BY ELECTRONIC MAIL**: On June 10, 2025, I caused such documents described herein to be sent to the person(s) at the e-mail addresses listed below. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**4. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 10, 2025 Lydia K. Tharp  
Date Printed Name

/s/ Lydia K. Tharp  
Signature

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